

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

PARAGON COMPONENT SYSTEMS, LLC,

Plaintiffs,

v.

Case No.: 3:25-cv-00170-wmc

QUALTIM INC., CENTER FOR BUILDING
INNOVATION LLC, DRJ ENGINEERING LLC,
INSPIRED PURSUITS LLC, KIRK GRUNDAHL,
AND SUZANNE GRUNDAHL

Defendants.

**MOTION TO DISMISS FOR FAILURE TO JOIN NECESSARY AND
INDISPENSIBLE PARTIES, AND MOTION TO DISMISS OR STAY PENDING A
PARALLEL SUBSTANTIVE ACTION**

Defendants, by their undersigned attorney submits this motion to dismiss this case for failure to join Clearspan Components, Inc. as a necessary party and the Estate of Daniel Holland as an indispensable party. Additionally, before this case was transferred from the Eastern District of Tennessee, the dispute ripened into a substantive suit that was initially filed in Dane County Circuit Court. For the reasons stated in the attached memorandum (Exhibit 1), Defendants respectfully requests this Court to dismiss or stay this case for Declaratory Judgment.

Respectfully submitted,

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